

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Jeffrey K. Norling,

Plaintiff,

v.

Accounts Receivable Services, LLC,

Defendant.

Civil File No. 16-cv-03346-MJD/DTS

**SECOND DECLARATION OF  
JOCELYN FOUNTAIN**

STATE OF MINNESOTA )

)ss.

COUNTY OF HENNEPIN)

Jocelyn Fountain, Manager, Revenue Cycle, for Allina Health System, under penalty of perjury, states as follows:

1. I am legally competent to testify as I have personal knowledge of Jeffrey K. Norling's accounts with Allina Health System ("Allina") prior to the sale and assignment of Mr. Norling's accounts to Accounts Receivables Services, LLC ("ARS").

2. Books and records for accounts arising from medical services provided by Allina are maintained by Allina. I am personally familiar with the method of preparation of said books and records, and state that they are true and correct, with entries made in the ordinary course of business contemporaneous with the transaction giving rise to each entry.

3. On December 2, 2016, I signed and submitted a Declaration in connection with this matter.

4. Due to an oversight, my December 2, 2016 Declaration included only four of the original six billing statements sent to Mr. Norling setting out the balances owed for services rendered. Two of the pertinent invoices (while referenced in my Declaration), were inadvertently not attached: (1) an invoice dated May 3, 2012 for \$652.39 and (2) an invoice dated May 29, 2012 for \$58.19.

5. Based on the business records maintained by Allina, and consistent with the services rendered, a breakdown of the billing statements sent to Mr. Norling is as follows:

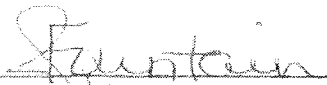
<u>Date</u>	<u>Balances</u>
1/3/2011	\$347.08
11/28/2011	\$114.37
5/3/2012	\$652.39
5/29/2012	\$ 58.19
10/14/2012	\$185.37
<u>5/21/2014</u>	<u>+ \$190.84</u>
	\$1,548.24

6. Attached are reproductions of the statements sent to Mr. Norling.

7. The accounts and associated accounts receivables outlined above owing by Mr. Norling to Allina were sold and transferred to ARS, on September 29, 2015.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: 5/29/18

  
 Jocelyn Fountain